

Intercontinental Terminals Company (ITC) Fire Morning Update Deer Park, Texas April 5, 2019 0000 – April 5, 2019 1159

Incident Management Objectives:

Objective 1: Ensure the health and safety of the public and response personnel.

Objective 2: Establish an incident management structure and processes employing the Incident Command System to enable effective overall management of the event with deployment of resources (staff and equipment) in a rapid, focused and well-coordinated manner.

Objective 3: Encourage a collaborative federalism approach, where Federal, State, Tribal, and local governments interact cooperatively and collectively to solve common problems.

Objective 4: Take actions to assess the on-site and off-site impacts during the emergency response phase of this incident. Provide this information to state and local authorities to assist them in their decision to protect the local citizens.

Objective 5: Conduct activities to prevent off-site releases from the ITC Tank Farm.

Objective 6: Respond to, mitigate and recovery off-site releases from the ITC Tank Farm.

Objective 7: Maintain open communication with Regional management

Incident Overview:

On March 17, 2019, an above ground storage tank containing Naphtha, caught fire at the Intercontinental Terminal Company (ITC), LLC facility in Deer Park Texas. The ITC facility consists of 15 80,000-barrel capacity above ground storage tanks containing petroleum products including Naphtha, Xylene, Toluene, Gasoline Blendstock, and Base Oil. Eleven of the 15 80,000-barrel capacity above ground storage tanks on site were involved in the fire, resulting in the release of contaminants into the atmosphere, as well discharging the contents of the tanks to drainage pathways. Firefighting water and foam potentially containing petroleum products were released from an outfall due to accumulation of water from firefighting efforts. Various firefighting organizations assisted in putting out the fire utilizing a variety of firefighting foams.

A partial breach of the tank farm containment wall on the northeast side near Tank 80-7 occurred at approximately 12:00 pm on March 22, 2019, to the ditched area and into Tucker Bayou. Additional boom was placed along the ditch leading to Tucker Bayou and Buffalo Bayou (Houston Ship Channel). The Responsible Party's contractor has rebuilt the containment wall using clay material.

At approximately 3:40 pm on March 22, 2019, three tanks reignited. The fire spread from the containment area through the breached containment wall into the ditch along Tidal Road. Foam was applied to the tanks and the ditch to extinguish the fire.

During and after the fire and the breach of the secondary containment, several readings of benzene above 1.0 ppm were detected (highest was 16.5 near National Tank Services) by the various entities

conducting air monitoring through the afternoon and night. These readings were located along the ship channel.

The United States Coast Guard (USCG) Captain of the Port is continuing the controlled open for the Ship Channel on March 26, 2019, with traffic during the daytime only. Decontamination vessels are being positioned to help ships that may have residue on the hulls.

Due to the initial fires and subsequent releases, shelters in place have occurred throughout the week of March 17, 2019.

Executive Overview:

- On April 5, 2019, at approximately 12:00 pm, the USCG reported a benzene exceedance of 3 ppm (parts per million) on water near the mouth of Old River related to the vessel decontamination operations conducted by USCG. After notification of the exceedance, the water strike team followed up at the location and did not observe benzene exceedance.
- On April 5, 2019, ITC reported a benzene exceedance of 20 ppm at the tank farm. The elevated benzene concentrations dissipated quickly.
- On April 5, 2019, ITC reported a benzene exceedance of 18 ppm on water near the mouth of Old River near the USCG decontamination operations. The source of the benzene exceedance was a barge carrying hazardous waste containing benzene. The strike team followed up and found no exceedances once the barge had passed through the decontamination area.
- On April 5, 2019, at approximately 5:00 pm, ITC and EPA reported a benzene exceedance of 4.5 ppm and 5.4 ppm, respectively. The source of the benzene exceedance is believed to be Southwest Shipyard facility located on Market Street in Channel View.
- On April 5, 2019, at approximately 2:30 pm, water operations at Division B were shut down due to safety concerns.
- On April 5, 2019, ITC continued breaking down the sludge in tanks 80-14 and 80-15, but the
 operations stopped due to elevated benzene levels. At 10:00 pm, ITC reported using a thermal
 oxidizer to de-gas tanks 80-14 and 80-15 to decrease off-gassing during sludge break-up
 operations. Sludge break-up operations will continue on April 6, 2019.
- ITC reported that 14 million gallons of waste water is stored in the waste water treatment tank as of 7:30 am on April 5, 2019.
- ITC reported sighting of an alligator near Bosco Docks during surface water sampling on April 5, 2019.
- ITC is preparing a plan to sample and remove the foam from residential yards that were reported on April 4, 2019, by residents to Texas Commission on Environmental Quality (TCEQ) and Harris County Pollution Control Services Department.
- ITC continues applying foam to the tanks and tank farm area as needed.
- ITC continued 24 hour-operations for flushing of Tucker Bayou on April 5, 2019.
- Several entities including Texas Commission on Environmental Quality (TCEQ), EPA, and ITC continue to conduct air monitoring around the tank farm, in adjoining industrial areas, and communities downwind from the facility.
- EPA conducted surface water sampling on April 5, 2019, at 10 sample locations. The surface water samples were collected along Buffalo Bayou and the San Jacinto River, and will be analyzed for PFAS, VOCs, SVOCs, COD, and Oil & Grease.
- The Airborne Spectral Photometric Environmental Collection Technology (ASPECT) aircraft did not fly during this reporting period due to fog. The ASPECT aircraft returned to Dallas home base for maintenance. The aircraft will return on April 6, 2019, if weather conditions are suitable.
- EPA conducted air sampling using the Trace Atmospheric Gas Analyzer (TAGA) on April 4, 2019. The TAGA analyzed the air samples for benzene, toluene and xylene. The TAGA air sampling results were compared to the Texas Commission on Environmental Quality (TCEQ) short-term Air Monitoring Comparison Values (AMCVs) and found no exceedances of the short-term AMCVs for toluene. The TAGA air sampling results found exceedances of the short-term AMCV for benzene (0.18 ppm) and xylene (1.7 ppm) directly north of the ITC facility. These exceedances of the short-term AMCV for benzene and xylene have been shared with unified command and local officials.

- EPA conducted handheld air monitoring on April 4, 2019, from 00:00 to 23:59 at 58 locations. Results were reported above the detection limit at four locations for total volatile organic compounds (VOCs). EPA will continue to conduct additional air monitoring.
- TCEQ continued handheld air monitoring on April 4 from 12:00 am to 10:00; no readings above the Unified Command action level were detected.
- ITC continued community air monitoring on April 5 (12:00 am to 11:59 pm); there were 3,473 VOC readings (482 detections) and 4784 benzene readings (603 detections).
- As of Friday, April 5, 2019:
 - o 137,400 feet of boom deployed
 - o 89,576 bbl of product/water recovered from water operations
 - o 127,457 bbl of product/water recovered from tank farm
 - Approximately 465,000 gallons of foam concentrate used for firefighting/suppression and emission suppression

Total Vessels as of April 4, 2019						
Work Boats	Barges	Small Capacity Skimming Vessels	Skimmers	Total Vessels		
117	105	25	111	358		

Tank Status	Tank No.
Complete	80-2, 80-3, 80-7, 80-9, 80-10, 80-12, 80-13, 80-14, 80-15
Standby	80-1, 80-4, 80-5, 80-6, 80-8, 80-11

Coordination with State Agencies:

On March 17, 2019, in response to a tank fire at the ITC, federal, state and local agencies joined ITC in a Unified Command. Multiple agencies including the United States Coast Guard, the TCEQ, and Harris County Pollution Control Services supported the response effort.

EPA Resources:

Personnel	EPA R6 Dallas	ITC Deer Park	Total
EPA Region 6	<mark>11</mark>	10	<mark>21</mark>
EPA Non-Region 6	<mark>0</mark>	6	<mark>6</mark>
START	1	18	<mark>19</mark>
Other Contractors	<mark>0</mark>	8	<mark>8</mark>
Total	<mark>12</mark>	42	<mark>54</mark>

Additional Information: Air Monitoring and Water Sampling locations, and Waste Storage Tanks: